

KANI_S.3dep

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,)	CRIMINAL CASE NO. 00-00017
)	
Plaintiff,)	
)	
vs.)	NOTICE OF INTENTION TO TAKE
)	THIRD PARTY ORAL DEPOSITION
SIDNEY CAPELLE KANI,)	WITH SUBPOENA DUCES TECUM
)	
Defendant.)	
_____)	

TO: Isidro Kani and Gloria Kani
P.O. Box XXXX CHRB
Saipan, MP 96950

Please take notice that the United States of America, the plaintiff and judgment creditor herein, will on May 20, 2008 take third party oral deposition of Isidro Kani and Gloria Kani, in the above styled and number case pursuant to Rules 30 and 69(a) of the Federal Rules of Civil Procedure and in aid of collecting its judgment.

Said third party deposition will take place at the offices of the United States Attorney, 3rd Floor, Horiguchi Building, Garapan, Saipan, MP at 4:00 p.m. on May 20, 2008 and will continue until completed. Said deposition will be taken before a Certified Court Reporter and will be taken upon oral examination for the purpose of discovery or as evidence or both pursuant to the Federal Rules of Civil Procedure.

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1 Notice is hereby further given that at this deposition, Isidro Kani and Gloria Kani, are
2 hereby required to produce all documents described in the accompanying Schedule A.

3 DATED, this 7th day of March, 2008.

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5 LEONARDO M. RAPADAS
6 United States Attorney
7 Districts of Guam and the NMI

8 By: /s/ Jessica F. Cruz
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SCHEDULE A TO NOTICE OF INTENT TO TAKE
THIRD PARTY ORAL DEPOSITION WITH SUBPOENA DUCES TECUM

1. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where any sole proprietorship, partnership or corporation in which you are joint with Sidney Capelle Kani and owns any interest.
2. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where you, joint with Sidney Capelle Kani, have an account of any kind, including but not limited too, time certificate of deposits.
3. All trust agreements in which you, joint with Sidney Capelle Kani, are named settlor, trustee, or beneficiary.
4. All deeds, leases, contracts, and other documents evidencing encumbrances of any kind on real property owned jointly with Sidney Capelle Kani.
5. All deeds of trusts, mortgages, or other documents evidencing encumbrances of any kind on real property owned jointly with Sidney Capelle Kani in which you, joint with Sidney Capelle Kani, have any ownership interest.
6. A listing of all stock, bonds, or other securities of any class you own jointly with Sidney Capelle Kani, including options to purchase any securities and the actual instruments if in your possession.
7. Current brokerage statements for the past twelve (12) months from any stock brokerage firm or similar entity where you, joint with Sidney Capelle Kani, have an account of any kind.
8. Title to any motor vehicle jointly owned with Sidney Capelle Kani.
9. All life insurance policies held by you in which Sidney Capelle Kani is either the insured or the beneficiary.
10. All promissory notes held by you, and all other documents evidencing any money owed to you, jointly with Sidney Capelle Kani, either now or in the future.
11. All deeds, titles, bills of sale, or other documents prepared in connection with any transfer of real or personal property made with you to Sidney Capelle Kani or jointly with Sidney Capelle Kani, either by gift, sale, or otherwise.
12. All documents evidencing any interest you have with Sidney Capelle Kani in any pension plan, retirement fund, or profit sharing plan.